

To: Bergman, Ronald[Bergman.Ronald@epa.gov]
Cc: Kumar, Chitra[Kumar.Chitra@epa.gov]; Green, Holly[Green.Holly@epa.gov]
From: Minter, Douglas
Sent: Fri 4/24/2015 9:45:07 PM
Subject: FW: Key Principles in EPA's UIC Class VI Rule Related to Transition of Class II ER Wells to Class VI

Greetings Ron: FYI, we are planning to hold our midyear review call with the North Dakota Class II program on May 5th. As prompted by Darcy's (our Acting ARA's) comment below, we believe that Class VI primacy will likely come up again during this call. If it does, we plan to keep our response very general, consistent with what you offered Mark Bohrer at GWPC in Austin. To date, I am not aware of Lynn Helms engaging HQs directly on this issue.

During that call, we will also let Mark know that we plan to conduct an onsite records review of his program in early summer followed by oversight inspections through shadowing some of their Class II inspectors. In briefing our RA yesterday on this oversight plan, Joan Card confirmed that she would continue to be the main Regional liaison in communications with HQs.

Douglas

From: O'Connor, Darcy
Sent: Friday, April 24, 2015 1:28 PM
To: Minter, Douglas
Subject: RE: Key Principles in EPA's UIC Class VI Rule Related to Transition of Class II ER Wells to Class VI

Thanks Douglas. I think that the last bullet on encouraging states to obtain primacy for the Class VI program will definitely come up in your conversation with NDIC in a couple of weeks. I'm not sure if Lynn has been talking with HQ directly on this or only through us. If he has been talking with Ron or his staff, you may want to prepare them for another call from the state.

Thanks!
D

From: Minter, Douglas

Sent: Friday, April 24, 2015 12:54 PM

To: Boomgaard, Craig; Bowling, Linda; Cheung, Wendy; Deardorff, Jason; Pfeiffer, Tricia; Shea, Valois; Suchomel, Bruce; Tinsley, Chuck; Brian.Walsh@state.sd.us; candace cady; carl anderson; dan jarvis; 2horses@nemontel.net; george hudak; john.passehl@wyo.gov; kevin frederick; mbohrer@nd.gov; stewart ellsworth; tom.kropatsch@wyo.gov; Bob Koehler - DNR

Cc: Pardue-Welch, Kimberly; O'Connor, Darcy; Hoskie, Sadie

Subject: FW: Key Principles in EPA's UIC Class VI Rule Related to Transition of Class II ER Wells to Class VI

Fyi.

From: Bergman, Ronald

Sent: Friday, April 24, 2015 12:01 PM

To: Contreras, Peter; Albright, David; Minter, Douglas; Mindrup, Mary; Hildebrandt, Kurt; Dellinger, Philip; Jann, Stephen; McManus, Fred; Johnson, KarenD; Kraft, Nicole; Downing, Jane; Springborg, Denise

Cc: Kumar, Chitra

Subject: FW: Key Principles in EPA's UIC Class VI Rule Related to Transition of Class II ER Wells to Class VI

Hello All,

Here is the UIC II-VI memo that just went to your Division Directors. Please contact me or Chitra Kumar if you have any questions. Thank you

Ron Bergman

202-564-3823

From: Grevatt, Peter

Sent: Friday, April 24, 2015 1:49 PM

To: Moraff, Kenneth; Matthews, Joan; Capacasa, Jon; Giattina, James; Hyde, Tinka; Honker, William; Flournoy, Karen; Hoskie, Sadie; Diamond, Jane; Montgomery, Michael; Opalski, Dan

Cc: Bergman, Ronald; Clark, Becki; Greene, Ashley; Kopocis, Ken; Rees, Sarah; McCabe, Janet; Gilinsky, Ellen; Loop, Travis; Marks, Teresa; Neugeboren, Steven; Shapiro, Mike
Subject: Key Principles in EPA's UIC Class VI Rule Related to Transition of Class II ER Wells to Class VI

Dear Water Division Directors:

As you are aware, most states have primary enforcement responsibility (i.e., primacy) for the Class II Underground Injection Control program for oil or gas-related injection activities, while EPA Regions currently retain direct implementation authority for the Class VI program in every state. EPA recognizes the importance of geologic sequestration of anthropogenic CO₂ for climate change mitigation, and the UIC Class VI Rule was developed to facilitate GS and ensure protection of underground sources of drinking water from the particular risks that large scale CO₂ injection for purposes of long-term storage may pose. The shared implementation of the UIC program necessitates a clear articulation and common understanding of the potential for transition of enhanced recovery (ER) wells from Class II to Class VI, consistent with EPA's Class VI Rule. I'm transmitting the attached memo to highlight the key principles in EPA's UIC Class VI Rule related to the transition from Class II to Class VI for ER wells that inject carbon dioxide for long-term storage. I encourage you to share this memorandum with your state UIC directors, and please let me know if you have any questions regarding the key principles related to Class II-VI transition articulated in the Class VI rule.

Thanks for your assistance, P. Grevatt

Peter Grevatt, Ph.D.

Director, Office of Ground Water and Drinking Water

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